

IN THE UNITED STATES DISTRICT COURT  
IN AND FOR THE DISTRICT OF DELAWARE

MARTIN DURANT,	:	
	:	
Plaintiff,	:	C.A. NO. 04-1534 (KAJ)
	:	
v.	:	
	:	JURY TRIAL DEMANDED
PERFECT CARE NURSES, INC.,	:	
	:	
Defendant.	:	

**PLAINTIFF'S RULE 26(a) PRE-DISCOVERY DISCLOSURES**

Plaintiff, Martin Durant, by and through his undersigned attorney, hereby exchanges the following Pre-Discovery Disclosures, pursuant to Fed. R. Civ. P. 26(a)(1).

I. The name and, if known, the address and telephone number of each individual likely to have discoverable information relevant to disputed facts alleged with particularity in the pleadings, identifying the subjects of the information.

**ANSWER:**

1. Witness, Mr. Simon A. Ewobor, President of Perfect Care Nurses, Inc., who is familiar with the daily operations of Perfect Care and Plaintiff's job responsibilities, and payroll records.

2. Plaintiff, Mr. Martin Durant who can be reached through his attorney.

4. Plaintiff may identify additional witnesses in the future.

5. Plaintiff also reserves the right to call any of Defendant's witnesses, including those indicated in Defendant's Rule 26(a) Initial Disclosures.

II. A copy of, or a description by category and location of, all documents, data compilations, and tangible things in the possession, custody, or control of the party that are relevant to disputed facts alleged with particularity in the pleadings.

**ANSWER:**

1. Copies of various pay stubs Plaintiff received from Defendant.

2. Copies of various invoices from Defendant to facilities in which Plaintiff was assigned to work.

3. Copy of Plaintiff's employee/personnel file and complete payroll records will be requested from Defendant.

15. Additional documents may be named during the discovery process.

16. Plaintiff reserves the right to use any of Defendant's documents, including those indicated in Defendant's Rule 26(a) Initial Disclosures.

III. A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

**ANSWER:**

To be provided at a later date.

IV. For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

**ANSWER:**

Not applicable.

MARGOLIS EDELSTEIN



Jeffrey K. Martin, Esquire (#2407)

Timothy J. Wilson (#4323)

1509 Gilpin Avenue

Wilmington, DE 19806

(302) 777-4680

(302) 777-4682 fax

Attorneys for Plaintiff

Dated: April 12, 2005

IN THE UNITED STATES DISTRICT COURT  
IN AND FOR THE DISTRICT OF DELAWARE

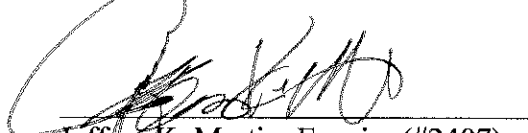
MARTIN DURANT,	:	
	:	
Plaintiff,	:	C.A. NO. 04-1534 (KAJ)
	:	
v.	:	
	:	JURY TRIAL DEMANDED
PERFECT CARE NURSES, INC.,	:	
	:	
Defendant.	:	

**CERTIFICATE OF SERVICE**

I, Jeffrey K. Martin, do hereby certify that on April 12, 2005, I electronically filed the *Certificate of Service* to *Plaintiff's Rule 26(a) Initial Disclosures* with the Clerk of the Court using CM/ECF which will send notification of such filing, and have also sent two (2) true and correct copies of *Plaintiff's Rule 26(a) Initial Disclosures* and the respective *Certificate of Service* for same via first class U.S. Mail, postage prepaid to the following:

Christian J. Singlewald, Esquire  
824 N. Market Street, Suite 902  
P.O. Box 709  
Wilmington, DE 19899-0709

MARGOLIS EDELSTEIN



Jeffrey K. Martin, Esquire (#2407)  
Timothy J. Wilson (#4323)  
1509 Gilpin Avenue  
Wilmington, DE 19806  
(302) 777-4680  
(303) 777-4682 fax  
Attorneys for Plaintiff

Dated: April 12, 2005